

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JAMES GREENE, JENNIFER SHAAL, OFER  
SHAAL, JAKE STONE, GUY SHOSHAN, EINAT  
EZRA MICHAELI, and YIFAT SHMILOVICH, on  
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

KABBALAH CENTRE INTERNATIONAL,  
INCORPORATED; KABBALAH CENTRES OF  
THE UNITED STATES, INCORPORATED;  
KABBALAH CENTRE OF NEW YORK,  
INCORPORATED; THE KABBALAH CENTRE OF  
FLORIDA, INC.; KABBALAH CHILDREN'S  
ACADEMY; KABBALAH ENTERPRISES,  
INCORPORATED; KAF INVESTMENTS, LLC; 501  
N. LA CIENEGA, LLC; SPIRITUALITY FOR KIDS  
INTERNATIONAL, INC.; and KAREN BERG,  
YEHUDA BERG, and MICHAEL BERG,

Defendants.

No. 19-cv-4304 (ILG)(SJB)

**DECLARATION OF ELISE M.  
BLOOM, ESQ., IN SUPPORT  
OF DEFENDANTS' MOTION  
TO DISMISS**

I, Elise M. Bloom, Esq., declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of the law firm of Proskauer Rose LLP, attorneys for Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; and Spirituality For Kids International, Inc. (collectively, "the Centre") in the above-captioned action. I am fully familiar with the facts set forth herein. I submit this declaration in support of Defendants' Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

2. Attached hereto as **Exhibit A** is a true and correct copy of a redline comparing the Amended Complaint (Dkt. 44) to the Original Complaint (Dkt. 1).

3. Attached hereto as **Exhibit B** is a true and correct copy of a printout of the “About Us” section of the Centre’s website, which was last accessed on September 13, 2019 at <https://kabbalah.com/en/about-us>.

4. Attached hereto as **Exhibit C** is a true and correct copy of a printout of the “Events” section of the Centre’s website, which was last accessed on September 13, 2019 at <https://kabbalah.com/en/events>.

5. Attached hereto as **Exhibit D** is a true and correct copy of a printout of the “Holidays” section of the Centre’s website, which was last accessed on September 13, 2019 at <https://kabbalah.com/en/holidays/rh>.

6. Attached hereto as **Exhibit E** is a true and correct copy of a printout of the Centre’s online bookstore, which was last accessed on September 13, 2019 at <https://store-us.kabbalah.com/collections/books>.

7. Attached hereto as **Exhibit F** is a true and correct copy of a printout of a post from Plaintiff James Greene’s website entitled “Late Blooming... Moments of Truth,” which was last accessed on September 13, 2019 at <https://jamiagreene.com/late-blooming-moments-of-truth/>.

8. Attached hereto as **Exhibit G** is a true and correct copy of a printout of a post from Plaintiff James Greene’s website entitled “The Art of Negotiation I and II,” which was last accessed on September 16, 2019 at <https://jamiagreene.com/the-art-of-negotiation-i-and-ii/>.

9. Attached hereto as **Exhibit H** is a true and correct copy of a printout of an item of jewelry listed for sale on the Centre’s gift shop website, which was last accessed on November

17, 2019 at [https://store-us.kabbalah.com/products/earrings-mandala-pink-quartz?\\_pos=8&\\_sid=4874fbcf0&\\_ss=r](https://store-us.kabbalah.com/products/earrings-mandala-pink-quartz?_pos=8&_sid=4874fbcf0&_ss=r).

10. Attached hereto as **Exhibit I** is a true and correct copy of a printout of Madonna's Author's Statement regarding her children's book "The English Roses", which was last accessed on November 19, 2019 at <http://www.englishrosescollection.com/>.

11. Attached hereto as **Exhibit J** is a true and correct copy of an agreement signed by Jamie Greene in connection with the cessation of his membership in the Centre's Religious Order of Chevre, dated March 4, 2009, and executed on or around March 9, 2009.

12. Attached hereto as **Exhibit K** is a true and correct copy of a "Vow of Poverty" signed by Einat Hadas Michaeli on or around April 2, 2001.

13. Attached hereto as **Exhibit L** is a true and correct copy of a "Chevre Agreement" signed by Einat Hadas Michaeli on or around October 23, 2009, as well as the Chevre Code for the Centre's Religious Order of Chevre referenced therein.

14. Attached hereto as **Exhibit M** is a true and correct copy of an "R1" visa issued by the U.S. Citizenship and Immigration Services to Einat Hadas Michaeli on August 17, 2007.

I affirm under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
November 25, 2019

PROSKAUER ROSE LLP

By: /s/ Elise M. Bloom